

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

08 MJ 1446

UNITED STATES OF AMERICA,

) MAGISTRATE Case No. AP 704

v.

) COMPLAINT FOR VIOLATION OF
SOUTHERN DISTRICT OF CALIFORNIA

Dawn Michelle Andrews

) 18 U.S.C. 656 (Misdemeanor)

) Misapplication of Funds by
Bank Employee

BEFORE

San Diego, California

United States Magistrate Judge

The undersigned complainant, being duly sworn states:

COUNT ONE

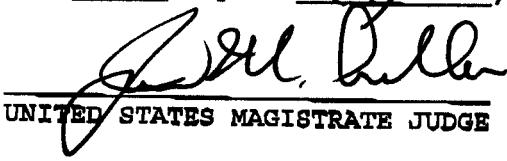
That during the period April 2007 to July 2007, and on three separate occasions within the Southern District of California, Defendant Dawn Michelle Andrews, being an employee of Washington Mutual Bank, 1091 South Mission Road, Fallbrook, California, the deposits of which were then insured by the Federal Deposit Insurance Corporation, with intent to injure and defraud, did knowingly and willfully embezzle, abstract, purloin, and willfully misapply the monies, funds, and credits entrusted to the care and custody of said bank, and under the care, custody, and control of the defendant as such employee; in violation of Title 18, United States Code, Section 656, a Misdemeanor.

And the complainant states that this complaint is based on the attached statement of facts which is incorporated herein by reference.



Signature of Complainant
Jeffrey B. Horner
Special Agent, FBI

Sworn to before me and
Subscribed in my presence
this 24th day of April, 2008.



UNITED STATES MAGISTRATE JUDGE

1 AFFIDAVIT
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STATE OF CALIFORNIA)

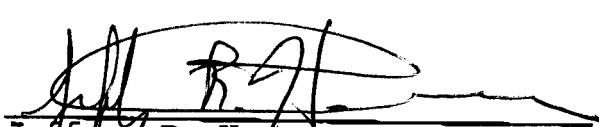
) ss.

COUNTY OF SAN DIEGO)

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9 I, Jeffrey B. Horner, being first duly sworn,
10 depose and say:11 1. I am a Special Agent of the Federal Bureau of
12 Investigation (FBI) assigned to the San Diego Division.13 2. Washington Mutual Bank, 1091 South Mission
14 Road, Fallbrook, California, was insured by the Federal
15 Deposit Insurance Corporation (FDIC) at the time the events
16 herein described occurred.17 3. Between April 2007 to July 2007, Dawn Michelle
18 Andrews (hereinafter referred to as Andrews), while employed
19 by Washington Mutual Bank, 1091 South Mission Road,
20 Fallbrook, California, stole \$2,900 in cash deposits from the
21 bank's Automated Teller Machine (ATM).22 4. On November 21, 2007, Andrews advised me that
23 while employed by Washington Mutual Bank as bank teller, she
24 stole \$2,900 in cash deposits from the bank's ATM. On three
25 separate occasions, Andrews took cash from the ATM deposit
26 envelopes and placed the money in her pocket. Andrews told
27 me she either disposed of the ATM deposit envelopes or
28 represented to other bank employees that the ATM deposit

1 envelopes did not contain any cash. Andrews told me that she
2 used the \$2,900 she stole from the bank to pay individuals
3 who threatened her claiming that her ex-husband owed them
4 money. After being confronted by executives from Washington
5 Mutual Bank, Andrews repaid the bank the \$2,900 she had
6 stolen using her rent money, loans from others, and the money
7 from her last paycheck.

8 5. On July 12, 2007 and November 21, 2007, Andrews
9 provided written statements admitting her actions as set
10 forth in paragraphs three and four. These written statements
11 are attached and incorporated herein by reference.

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16 Jeffrey B. Horner
17 Special Agent,
18 Federal Bureau of Investigation
19 San Diego, California

20
21 Subscribed and sworn to before me this 24th day of April,
22 2008.

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24 
25 United States Magistrate Judge
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7-12-07

Regarding the three atm deposits I took the money out, I have been approached by people that I do not know regarding money my ex husband owes or from something he did, or drugs I don't exactly know, but they said they know everything about me and my family, and they wanted \$3000.00 from me. That is all I know, I didn't ask anything else, I just wanted them to leave us alone, so I gave them the money.

Deem Ante

11-21-07

I took money from the ATMs 3 times for a total of \$2900.00. I was put in a position that I've never been in before were my children were threatened. People said that my ex ~~ever~~ owed them money, for what I don't know, and that since I was involved with him they wanted it from me. My ex knows nothing about this. He denies everything, but these people knew where my kids were at what times, where I worked at what kind of car I drive. So I was scared I paid them. After it was over I paid the bank back the \$2900 by cashier checks, out of the rent money and last check from the bank, I've moved from Fallbrook and are taking care of my children.

Dawn Airlines

Witnessed By:

JFL (Signature)

JFL, B-16111, 11-21-07

JANET M. BIRD

JANET M. BIRD, FBI, 11/21/07